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FILED IN UNITED STATES DISTRICT  
COURT, DISTRICT OF UTAH

NOV 22 2016

BY D. MARK JONES, CLERK  
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AARON MICHAEL SHAMO,

Defendant.

Case No. 2:16mj597-DBP

AMENDED COMPLAINT

Possession of Fentanyl with Intent to  
Distribute

Magistrate Judge Dustin B. Pead

Before Dustin B. Pead, United States Magistrate Judge for the District of Utah,  
appears the undersigned, who on oath deposes and says:

COUNT 1

On or about November 22, 2016, in the Central Division of the District of Utah,

AARON MICHAEL SHAMO,

the named defendant herein, did knowingly and intentionally possess with intent to  
distribute Fentanyl, a Schedule II controlled substance, within the meaning of  
21 U.S.C. § 812; all in violation of 21 U.S.C. §841(a)(1), and punishable pursuant to 21  
U.S.C. §841(b)(1)(C).

Complainant states that this complaint is based on information obtained through an investigation consisting of the following:

1. Complainant is a South Jordan Police Officer currently assigned to the Drug Enforcement Administration Metropolitan Narcotics Task Force (DEAMNTF) as a narcotics investigator. Complainant is familiar with the facts and circumstances alleged in this complaint.

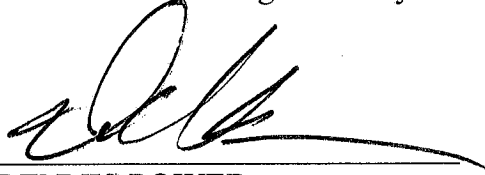
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2. On November 22, 2016, agents and officers executed a search warrant at the home of Aaron Michael SHAMO, at 7939 Titian Street in Cottonwood Heights, Utah, and at a stash location at 11469 Openview Lane in South Jordan, Utah.
3. Inside the Openview home, officers located what appears to be more than approximately 70,000 pills that have the appearance of oxycodone, and more than approximately 25,000 pills that have the appearance of Alprazolam, a/k/a Xanax. Both Oxycodone and Alprazolam are Schedule II controlled substances.
4. Inside the Titian home, officers located a pill press and bulk powdery substances that appeared to be ready to be pressed into pill form.
5. Based on a prior investigation spanning several months, agents have reason to believe that the powdery substance was Fentanyl. Agents also have reason to believe that the pills having the appearance of oxycodone actually contain the Schedule II controlled substance Fentanyl. It is believed that the

press was used to create the pills using the powdery substances. Due to the extreme dangerousness of Fentanyl, agents have not yet been able to test the substances seized at the SHAMO home on November 22, 2016. A Hazardous Materials team is on the scene and is safely processing the home and the seized items.

6. SHAMO is known to have employed several individuals over the last year to accept shipments of packages from China at their residences. These individuals would deliver the packages to SHAMO without opening them or inspecting the contents.
7. Within the last few months, law enforcement agents were able to seize several of the packages that were shipped to these individuals from China. One package was tested by a crime lab, and was found to contain 120 grams of Fentanyl. Other packages intended for SHAMO were similarly labeled, and the contents had a similar appearance.
8. Based on the prior testing and the appearance of the seized items, agents believe that the pills having the appearance of oxycodone which were seized on November 22, 2016 contain the Schedule II controlled substance Fentanyl.
9. Agents also located and seized packaging materials from the SHAMO home on November 22. Based on the prior investigation, agents know that SHAMO packages the pills in numerous smaller packages and distributes

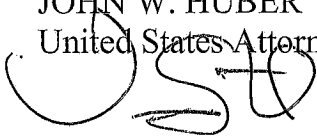
them by shipping them to various addresses around the United States using the United States Postal Service or other package delivery services.



DENNIS POWER  
Task Force Officer  
Drug Enforcement Administration

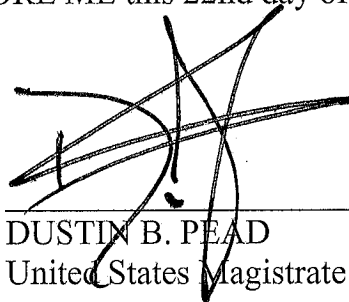
APPROVED:

JOHN W. HUBER  
United States Attorney



VERNON G. STEJSKAL  
Assistant United States Attorney

SUBSCRIBED AND SWORN TO BEFORE ME this 22nd day of November, 2016.



DUSTIN B. PEAD  
United States Magistrate Judge